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REPT OF TRANSPORTATION

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Docket Management Facility
U.S. Department of Transportation
Room PL-401, 400 Seventh St. SW
Washington, DC 20590-0001

RE: Docket # (TISCG 2000-6931) - 26

To Whom It May Concern:

The following are comments regarding the current NPRM titled "Fire-Suppression Systems and **Voyage Planning** for Towing Vessels".

As an operator of Uninspected towing vessels I strongly oppose this rule as currently written.

Comment 1) I request additional public meetings on this subject so that Western Rivers concerns can be heard. I suggest Huntington, W. Va. as there is a large and active port association there.

Comment 2) Voyage Planning: Just what constitutes a voyage on the Western Rivers? Our operations usually involve multiple stops and tow changes in a day's time. I have gone through as many as 3 pages of log sheets in a single 24-hour period with as many as 12 or more activity entries each. At times it gets difficult to stay ahead of the log work let alone attempting to develop a "Voyage Plan" between each of these stops and starts. Even if it is a matter of simply changing direction this occurs very often.

Additionally, you have placed the time of filling out the require information at around 30 minutes. Just a casual perusal of the information listed as required in the NPRM indicates to me this is understated. Simply gaging barge drafts in a 15 barge tow would easily exceed the 30 minutes stated. Even at a rate of 30 minutes the time requirement per day could easily exceed multiple hours. On our tow watch system this would have severe negative consequences on operations as we would have to be stopped while fulfilling this requirement. Even if the definition of a "Voyage" could be clearly made the inherent difficulties in fulfilling this requirement would remain.

In summary I believe that the requirement for Voyage Plans has no useful or meaningful purpose on the Western Rivers and would hurt the inland towing industry. We have access to shore and shore-based assistance at nearly all times.

Thank you for the opportunity to comment on this proposed rulemaking.

Sincerely,

Capt. Mark D. Kuntz



USCG 2000-6931

Regarding Sec. 164.80 Voyage planning

This rule should never be considered as a responsibility for Western Divers operations due to the fact that we are usually in areas where weather conditions, current speed and voyage changes happen frequently.

What is your definition of a voyage anyway?

As a pilot of a towing vessel our time is limited to a 12 hour daily shift.

During this 2-6 hour shift we must receive orders from dispatchers several times a day which could very well include 15 different destinations for a 15 barge tow.

We may clear as many as 10 to 15

Bridges in a 6 hour shift - who could safely and responsibly take care of his vessel and figure all of these vertical clearances and be able to pay attention to what their doing, this rule is ridiculous

Steve L. Shal

AEP 2-6-01